

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DEBORAH CHIN, On Behalf of Herself and All
Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.

Defendants.

Case No. 04 cv 10294 (DPW)

THIS DOCUMENT RELATES TO CASE NOS.:

04 cv 10307; 04 cv 10308; 04 cv 10309;
04 cv 10310; 04 cv 10329; 04 cv 10333;
04 cv 10345; 04 cv 10346; 04 cv 10359;
04 cv 10362; 04 cv 10363; 04 cv 10364;
04 cv 10382; 04 cv 10383; 04 cv 10384;
04 cv 10454; 04 cv 10576; 04 cv 10597;
04 cv 10612; 04 cv 10623; 04 cv 10714;
04 cv 10314 (MLW); 04 cv 11315 (MLW)

**CHRIS E. PATERICK'S MOTION FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF AND
FOR APPROVAL OF SELECTION OF LEAD COUNSEL**

Movant Chris E. Paterick hereby moves this Court pursuant to Fed. R. Civ. P. 42(a) and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. §78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Movant Chris E. Paterick ("Paterick"), for an order: (a) consolidating the above-mentioned securities class actions and any subsequently filed related actions; (b) appointing Paterick as Lead Plaintiff in this action and in any consolidated related action; and (c) approving Movant's selection of Wolf Popper LLP as Lead Counsel, and Shapiro Haber & Urmy LLP as

Liaison Counsel.

In support of his motion, Paterick respectfully submits: (1) a Memorandum of Law in Support of the Motion of Chris E. Paterick for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel, dated April 12, 2004; and (2) the Declaration of Robert C. Finkel in Support of the Motion of Chris E. Paterick for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel, dated April 12, 2004.

Dated April 12, 2004

Respectfully submitted,

SHAPIRO HABER & URMY, LLP

/s/Theodore M. Hess-Mahan

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